

1 Leah A. Martin, Esq.
Nevada Bar No. 7982
2 Christopher Huang, Esq.
Nevada Bar No. 14061
3 LEAH MARTIN LAW
6671 S. Las Vegas Blvd., Ste. 210
4 Las Vegas, Nevada 89119
Telephone: (702) 420-2733
5 Facsimile: (702) 330-3235
lmartin@leahmartinlv.com
6 chuang@leahmartinlv.com
Attorney for Defendants

7
8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 BRIAN HEBERT, an individual,

11 Plaintiff,

12 vs.

13 THE LITIGATION DOCUMENT GROUP,
INC., a Domestic Corporation; CRAIG
14 RENARD, an individual; DOES I through X,
inclusive; ROE CORPORATIONS I through
15 X, inclusive,

16 Defendants.

) Case No.: 2:17-cv-01536-KJD-CWH

) **STIPULATION AND ORDER TO**
) **CONTINUE EARLY NEUTRAL**
) **EVALUATION**

) **(THIRD REQUEST)**

17 **STIPULATION AND ORDER TO CONTINUE**
18 **EARLY NEUTRAL EVALUATION**
(Third Request)

19 Pursuant to LR IA 6-1, LR IA 6-2, LR 16-6, LR 26-4, and the Court's November 21,
20 2017 Order (Docket #28), the Parties hereto, by and through their attorneys of record,
21 respectfully submit their Stipulation and Order to Continue the Early Neutral Evaluation.
22 This is the Parties' Third Request to Continue the Early Neutral Evaluation.

23 The Parties' First Request was made on October 23, 2017 when Plaintiff's counsel, L.
24 Joe Coppedge, telephonically informed the Court of a family emergency. As such, the Court
25 vacated the Early Neutral Evaluation scheduled for October 24, 2017 and rescheduled it for
26 November 28, 2017. The Court noted that everything else in its September 11, 2017 Order
27 (Docket #15) remains unchanged.

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1 The Parties' Second Request was made on November 21, 2017 when the Parties
2 submitted a Stipulation to Extend the Early Neutral Evaluation because the Defendants'
3 representative with decision-making authority would not be available for the Early Neutral
4 Evaluation due to the Thanksgiving holiday. As such, the Court vacated the Early Neutral
5 Evaluation scheduled for November 28, 2017 and rescheduled it for January 11, 2018. The
6 Court noted that everything else in its September 11, 2017 Order (Docket #15) remains
7 unchanged.

8 **I. Good Cause to Continue Early Neutral Evaluation**

9 When the Parties Second Request was submitted, Defendants' representative's, who
10 is also the President of his company, available dates were provided. Shortly after the Court
11 rescheduled the Early Neutral Evaluation, Defendants' representative had a business matter
12 come up that will necessitate his being out of state during the rescheduled date of January 11,
13 2018. As this Third Request is being submitted more than 21 days before January 11, 2018,
14 there is good cause to continue the Early Neutral Evaluation.

15 **II. Proposed Dates to Reschedule the Early Neutral Evaluation**

16 The Parties have been informed that the Court is available to conduct the Early
17 Neutral Evaluation in January except for the week of January 15 – 19 and that we should
18 include proposed dates. Please find the proposed dates below:

19 January 8, 2018 Monday

20 January 22, 2018 Monday

21 January 23, 2018 Tuesday

22 January 29, 2018 Monday

23 January 30, 2018 Tuesday

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28 ///

1 **III. Conclusion**

2 Based on the foregoing, the Parties respectfully submit that the Court reschedule the
3 Early Neutral Evaluation to one of the proposed dates when all required people will be able
4 to attend.

5 RESPECTFULLY SUBMITTED,

6
7 Dated this 11th day of December, 2017

Dated this 11th day of December, 2017

8 MUSHKIN CICA COPPEDGE

LEAH MARTIN LAW

9 /s/ Joe Coppedge

/s/ Christopher Huang

10 L. JOE COPPEDGE, ESQ.

LEAH A. MARTIN, ESQ

11 Nevada Bar No. 4954

Nevada Bar No. 7982

12 4475 S. Pecos Road

CHRISTOPHER HUANG, ESQ.

13 Las Vegas, NV 89121

Nevada Bar No. 14061

14 Telephone: 702-386-3999

6671 S. Las Vegas Blvd., Ste. 210

Facsimile: 702-454-3333

Las Vegas, NV 89119

15 jcoppedge@mccnvlaw.com

Telephone: 702-420-2733

16 *Attorneys for Plaintiff*

Facsimile: 702-330-3235

lmartin@leahmartinlv.com

chuang@leahmartinlv.com

Attorneys for Defendants

17
18 IT IS SO ORDERED.

19
20 UNITED STATES ~~DISTRICT~~ JUDGE

21 DATED: Magistrate

22 December 11, 2017

23 IT IS HEREBY ORDERED that the Early Neutral Evaluation session scheduled for
24 January 11, 2018 is RESCHEDULED to January 29, 2018 at 10:00 AM. All else as
25 stated in the Order (ECF No. 15) scheduling the ENE remains unchanged. The
26 confidential statement is due at 4:00 PM, January 22, 2018.
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